

DAYLE ELIESON  
United States Attorney  
District of Nevada  
TINA NAICKER, CSBN 252766  
Special Assistant United States Attorney  
160 Spear Street, Suite 800  
San Francisco, California 94105  
Telephone: (415) 268-5611  
Facsimile: (415) 744-0134  
E-Mail: Tina.Naicker@SSA.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SHARONE RANDOLPH,  
Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,  
Defendant.

Case No. 2:18-cv-00555-JAD-PAL

**JOINT STIPULATION FOR EXTENSION OF  
TIME AND [PROPOSED ORDER]**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from September 13, 2018 to **October 29, 2018**. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel was recently out on intermittent medical leave and bereavement leave for the past few months. Counsel has over 75+ active matters, which requires two or more dispositive motions a week until mid-September. In addition, Counsel has active civil rights and representative misconduct matters that require immediate investigation. Counsel also has a Ninth Circuit brief due on October 1, 2018, which requires multiple levels of review. Due to Counsel's unexpected leave, Counsel became behind on her heavy workload. As such, Counsel needs additional

1 time to adequately review the transcript and properly respond to Plaintiff's Motion for Summary  
2 Judgment. Counsel for Defendant is also expected to be out of the office from September 3, 2018  
3 through September 9, 2018 and September 21, 2018 through September 27, 2018. Defendant makes  
4 this request in good faith with no intention to unduly delay the proceedings. The parties further  
5 stipulate that the Court's Scheduling Order shall be modified accordingly.  
6

7 Respectfully submitted,

8 Dated: September 13, 2018

/s/ \*Cyrus Safa  
(\*as authorized by email on September 13, 2018)  
CYRUS SAFA  
Attorney for Plaintiff

11  
12 Dated: September 13, 2018

MCGREGOR W. SCOTT  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

15  
16 By /s/ Tina L. Naicker  
17 TINA L. NAICKER  
18 Special Assistant U.S. Attorney  
Attorneys for Defendant

19 **ORDER**

20 APPROVED AND SO ORDERED:  
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22  
23 DATED: September 17, 2018

  
HON. PEGGY A. LEEN  
UNITED STATES MAGISTRATE JUDGE

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**CM/ECF:**

Gerald Welt  
Gerald M. Welt, Chtd.  
703 S. 8th St.  
Las Vegas, NV 89101  
702-382-2030  
Fax: 702-684-5157  
Email: gmwesq@weltlaw.com

Respectfully submitted this 13th day of September 2018,

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